

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**BERNETTA LASHAY WILLIS**

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**CR. NO. 2:06cr0071-MEF**

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**United States' Unopposed Motion for Extension  
of PSI Deadlines and to Set Sentencing Date**

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The United States respectfully moves the Court to grant a continuance of time for the parties in this case to submit objections to the Probation Officer's Presentence Investigation Report (PSI). The United States also requests that the Court set a sentencing date in this case. It requests this relief for the following reasons:

1. On April 6, 2007, the Court issued an Order, setting Defendant Bernetta Willis's sentencing on June 29, 2007.<sup>1</sup> That order fixed June 8, 2007, as the date for parties to notify the Probation Officer of objections to the PSI and June 12, 2007, as the date for the objections conference.

2. On April 12, 2007, in response to a motion from Willis to extend her deadline to file a motion for new trial, the Court ordered that the sentencing be "continued until further

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<sup>1</sup> See DE #223.

order of the Court.”<sup>2</sup> The order did not make any mention of the whether the previous PSI-related deadlines were also continued.

3. The Government lodged several oral objections to the Probation Officer’s initial draft-PSI prior to the June 8, 2007 deadline, but because of a busy trial docket has not yet filed its formal written objections. Willis’s defense counsel, Tim Halstrom, has indicated to the Government that he has not yet filed any objections, believing that the objections deadlines also had been or would be continued. Mr. Halstrom, however, has indicated to the Government that he would like to have the opportunity to file objections to the PSI.

4. Thus, Willis and the Government would ask the Court to fix new deadlines for the parties to file their written objections to the PSI. Because Mr. Halstrom is currently in a lengthy trial, the parties would ask the Court to give the parties at least an additional three weeks from the date of the Court’s order to file their objections, if any, to Willis’s PSI.

5. Additionally, the time for Willis to file a motion for a new trial has passed, and the parties would therefore ask the Court to set a sentencing date. In her extension motion, Willis asked that her deadline to file a new trial be set fourteen days from the date that Mr. Halstrom received the trial transcripts. On May 8, 2007, the Court Report in this case filed the trial transcripts; thus any motion for new trial should have been filed on or before May 22, 2007. In a telephonic conversation today with Government, Mr. Halstrom indicated that he indeed would not be filing a motion for new trial.

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<sup>2</sup> See DE #227.

Therefore, because Willis will not be filing a motion for a new trial, the Government and the Defendant also would ask the Court to set a sentencing date for this case. The parties also request an additional three weeks from the date of the Court's order to file their objections, if any, to Willis's PSI.

Respectfully submitted this 14th day of June, 2007.

LEURA G. CANARY  
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I hereby certify that on June 14, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: Tim Halstrom.

/s/ Christopher Snyder  
CHRISTOPHER A. SNYDER  
Assistant United States Attorney